

**Communications
Workers of America**
AFL-CIO, CLC

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March 1, 2004

Ms. Marlene Dortch, Secretary
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, D.C. 20554

Dear Ms. Dortch:

RE: Ex Parte Notice. WC Docket No. 03-228. In the Matter of Section 272(b)(1)'s "Operate Independently" Requirement for Section 272 Affiliate

On Feb. 27, 2004, Morton Bahr, President, Communications Workers of America, sent the attached letter to Commissioner Jonathan Adelstein in the above-captioned proceeding. Mr. Bahr urged Commissioner Adelstein to support the elimination of the rule that prohibits sharing technicians performing OI&M functions between a Bell Operating Company and its long-distance affiliate.

The prohibition imposes costs and inefficiencies, interferes with customer quality service, and serves as a barrier to career opportunity for CWA-represented technicians. The Commission can protect against cross-subsidization through accounting safeguards, rather than imposing costly, inefficient structural safeguards.

Sincerely,

Debbie Goldman, Research Economist
Research and Development Department

Attachment

cc: Jonathan Adelstein